

# **EXHIBIT A**

Edward S. Weisfelner  
David J. Molton  
May Orenstein  
Howard S. Steel  
BROWN RUDNICK LLP  
Seven Times Square  
New York, New York 10036  
T: 212-209-4800  
E: eweisfelner@brownrudnick.com  
E: dmolton@brownrudnick.com  
E: morenstein@brownrudnick.com  
E: hsteel@brownrudnick.com

Sander L. Esserman  
STUTZMAN, BROMBERG, ESSERMAN &  
PLIFKA, P.C.  
2323 Bryan Street,  
Suite 2200  
Dallas, Texas 75201  
T: 214-969-4900  
E: esserman@sbep-law.com

*Designated Counsel for Ignition Switch Plaintiffs*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**APPELLANTS' STATEMENT OF ISSUES ON APPEAL AND AMENDED  
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Appellants-Ignition Switch Plaintiffs (the "**Appellants**"),<sup>1</sup> by and through their undersigned counsel, respectfully submit the following: (i) statement of issues to be presented on appeal from the *Judgment*, dated June 1, 2015 [ECF No. 13177] and *Decision on Motion to Enforce Sale Order*, dated April 15, 2015 [ECF No. 13109]; and (ii) amended designation of items to be included in the record on appeal.

<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Judgment or the Decision. As defined in the Judgment, the term "**Ignition Switch Plaintiffs**" shall mean plaintiffs that have commenced a lawsuit against New GM asserting economic losses based on or arising from the Ignition Switch in the Subject Vehicles (each term as defined in the *Agreed and Disputed Stipulations of Fact Pursuant to the Court's Supplemental Scheduling Order, Dated July 11, 2014*, filed on August 8, 2014 [ECF No. 12826], at 3).

**I. Statement Of Issues To Be Presented On Appeal.**

The Appellants submit the following statement of issues on appeal:

1. Did the Bankruptcy Court exceed its jurisdictional authority or otherwise err in holding that the Sale Order may be enforced so as to enjoin claims against New GM based on New GM's own independent, post-Closing acts or conduct?

2. Did the Bankruptcy Court err in entering a Judgment providing for enforcement of the Sale Order by enjoining and barring claims asserted against New GM where such claims "concern[] an Old GM vehicle or part," and through the creation of procedures for staying, striking or dismissing such claims?

3. Did the Bankruptcy Court err in holding that the Ignition Switch Plaintiffs must demonstrate prejudice in order to establish a due process violation in connection with the entry or enforcement of the Sale Order?

4. Did the Bankruptcy Court err in holding that the Ignition Switch Plaintiffs failed to demonstrate prejudice in connection with the entry or enforcement of the Sale Order?

5. Did the Bankruptcy Court err in failing to consider the allegations of New GM's improper concealment of the Ignition Switch Defect in connection with the entry or enforcement of the Sale Order?

6. Did the Bankruptcy Court err by not providing the Ignition Switch Plaintiffs the opportunity for further development of the factual record in connection with the enforcement of the Sale Order, including, without limitation, as to the issue of prejudice, upon the Bankruptcy Court's determination that the Ignition Switch Plaintiffs had to demonstrate such prejudice in order to establish a due process violation in connection with the entry or enforcement of the Sale Order?

7. Did the Bankruptcy Court err in applying the doctrine of equitable mootness to the claims of the Ignition Switch Plaintiffs?

8. Did the Bankruptcy Court err in holding that the rulings in the Decision and the Judgment shall apply to any other plaintiffs not represented by Designated Counsel?

**II. Designation Of Items To Be Included In The Record On Appeal.**

The Appellants submit the following designation of items to be included in the record on appeal (including any exhibit, annex, or addendum thereto):

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>1</b>	Motion for Sale of Property under Section 363(b)/Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing	6/1/2009	92
<b>2</b>	Memorandum of Law In Support of Debtors' Motion Pursuant To 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365, and Fed. R. Bankr. P. 2002, 6004 and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC	6/1/2009	105
<b>3</b>	Certificate of Service (First Day Motion Service)	6/1/2009	134
<b>4</b>	Order Approving Procedures for Sale of Debtors' Assets Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Scheduling Bid Deadline and Sale Hearing Date, Establishing Assumption and Assignment Procedures and Fixing Notice Procedures and Approving Form of Notice	6/2/2009	274
<b>5</b>	Notice of Filing of the Amended Master Sale and Purchase Agreement and Certain Exhibits of the Disclosure Schedule Thereto	6/27/2009	2649
<b>6</b>	Declaration/Certificate of Publication of Notice of Sale Hearing	6/29/2009	2757

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>7</b>	Declaration/Certificate of Publication of Notice of Commencement of Chapter 11 Cases and First Day Hearing	7/1/2009	2910
<b>8</b>	Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement	7/5/2009	2967
<b>9</b>	Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief	7/5/2009	2968
<b>10</b>	Errata Order Regarding Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of Related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement	7/6/2009	2985
<b>11</b>	Transcript regarding Hearing Held on 7/2/09 9:02 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	7/8/2009	3062
<b>12</b>	Transcript regarding Hearing Held on 6/30/09 10:07 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	7/8/2009	3087
<b>13</b>	Transcript regarding Hearing Held on 7/1/09 7:59 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	7/15/2009	3205

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>14</b>	Debtors' Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/2/2009	3940
<b>15</b>	Affidavit of Service of the Notice and Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3), Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(B)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/11/2009	4020
<b>16</b>	Order Establishing the Deadline For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/16/2009	4079
<b>17</b>	Certificate of Publication of the Notice of Deadlines For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code (the General Notice) and the Notice of Deadline for Filing Proofs of Claim (the Local Notice))	1/5/2010	4724
<b>18</b>	Affidavit of Publication of Notice of Deadlines for Filing Certain Proofs of Claim	1/25/2010	4877
<b>19</b>	Affidavit of Service of 1) Debtors' Joint Chapter 11 Plan and 2) Disclosure Statement for Debtors' Joint Chapter 11 Plan	9/3/2010	6852
<b>20</b>	Debtors' Motion for an Order (I) Approving Notice of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Solicitation Packages; and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes under the Plan	9/3/2010	6854

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>21</b>	Affidavit of Service of Notice of Hearing on Debtors' Motion for an Order (I) Approving Notice of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Solicitation Packages and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes Under the Plan	9/7/2010	6867
<b>22</b>	Notice of Certification of Publication of Notice of Hearing to Consider Approval of Debtors' Proposed Disclosure Statement with Respect to Debtors' Joint Chapter 11 Plan	10/5/2010	7239
<b>23</b>	Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan	12/7/2010	8014
<b>24</b>	Debtors' Amended Joint Chapter 11 Plan	12/7/2010	8015
<b>25</b>	Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan	12/8/2010	8023
<b>26</b>	Affidavit of Service of Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan and Debtors' Amended Joint Chapter 11 Plan	12/8/2010	8024
<b>27</b>	Order Granting Motion (I) Approving Notice Of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Notice Packages and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes Under the Plan	12/8/2010	8043
<b>28</b>	Affidavit of Service of Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan	12/10/2010	8053
<b>29</b>	Affidavit of Publication of the Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date	1/18/2011	8673

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>30</b>	Amended Affidavit of Publication of Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date (related document ECF No. 8673)	1/21/2011	8788
<b>31</b>	Amended Affidavit of Publication of Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date (related document ECF No. 8788)	2/16/2011	9277
<b>32</b>	Debtors' Second Amended Joint Chapter 11 Plan	3/18/2011	9836
<b>33</b>	Affidavit of Service of Debtors' Second Amended Joint Chapter 11 Plan	3/21/2011	9845
<b>34</b>	Findings of Fact and Conclusions of Law and Order Pursuant to Sections 1129(A) and (B) of the Bankruptcy Code and Rule 3020 Of The Federal Rules Of Bankruptcy Procedure Confirming Debtors Second Amended Joint Chapter 11 Plan	3/29/2011	9941
<b>35</b>	Corrected Notice of Occurrence of Effective Date of Debtors' Second Amended Joint Chapter 11 Plan	4/6/2011	10056
<b>36</b>	Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective Date	5/3/2011	10151
<b>37</b>	Notice of Certification of Publication of the Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective Date	5/10/2011	10214
<b>38</b>	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2011	8/1/2011	10648
<b>39</b>	Supplemental Status Report - Supplement to Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2011	9/14/2011	10874
<b>40</b>	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of September 30, 2011	10/28/2011	11090



<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>41</b>	Notice of Proposed Order Approving Motion and Motion Pursuant to Bankruptcy Rule 3003 and Section 105(a) of the Bankruptcy Code for an Order Disallowing Certain Late Filed Claims	1/26/2012	11351
<b>42</b>	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of December 31, 2011	1/30/2012	11358
<b>43</b>	Order Approving Motion Pursuant to Bankruptcy Rule 3003 and Section 105(a) of the Bankruptcy Code Disallowing Certain Late Filed Claims	2/8/2012	11394
<b>44</b>	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	4/21/2014	12620
<b>45</b>	Exhibits to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	4/21/2014	12621
<b>46</b>	Endorsed Order Regarding Letter Dated April 21, 2014, filed by Arthur Steinberg on behalf of General Motors LLC (ECF No. 12622)	4/22/2014	12627
<b>47</b>	Notice of (A) Filing of Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (B) Conference to be Held in Connection with Such Motion	4/22/2014	12628
<b>48</b>	Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, filed by Edward S. Weisfelner on behalf of Daniel Ratzlaff, Patricia Barker, Sylvia Benton, Nicole Heuler, Katie Michelle McConnell, Carlota Onofre, and Teleso Satele, individually and as putative class representatives	4/22/2014	12629
<b>49</b>	Cover Page and Exhibits to Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (relates to ECF No. 12629)	4/23/2014	12640
<b>50</b>	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of March 31, 2014	4/24/2014	12653
<b>51</b>	Supplements to Schedule 1 and Schedule 2 to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce	4/30/2014	12672

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>52</b>	Letter to the Honorable Robert E. Gerber Regarding May 2, 2014 Status Conference, filed on behalf of General Motors LLC	4/30/2014	12673
<b>53</b>	Amended Notice of (A) Filing of Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (B) Conference to be Held in Connection with Such Motion	5/1/2014	12675
<b>54</b>	Letter to the Honorable Robert E. Gerber in response to New GM's Letter of 4/30/2014 (ECF No. 12673), filed by Edward S. Weisfelner on behalf of Plaintiffs	5/1/2014	12677
<b>55</b>	Notice of Settlement of Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction; (II) Objection filed by Certain Plaintiffs in Respect Thereto; and (III) Adversary Proceeding No. 14-01929	5/12/2014	12690
<b>56</b>	Objection to Notice of Settlement of Scheduling Order, filed on behalf of Proposed Lead Plaintiffs	5/15/2014	12693
<b>57</b>	Reply to Objection to Notice of Settlement of Scheduling Order, filed by Edward S. Weisfelner on behalf of Designated Counsel	5/15/2014	12695
<b>58</b>	Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respects Thereto, and (III) Adversary Proceeding No. 14-01929	5/16/2014	12697
<b>59</b>	Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	5/19/2014	12698
<b>60</b>	Second Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	5/19/2014	12699
<b>61</b>	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of March 31, 2014	5/23/2014	12708
<b>62</b>	Third Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	6/2/2014	12717

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>63</b>	Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/2/2014	12718
<b>64</b>	Corrected Third Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/2/2014	12719
<b>65</b>	Corrected Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/2/2014	12720
<b>66</b>	Fourth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/13/2014	12722
<b>67</b>	Fourth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/13/2014	12723
<b>68</b>	Response By General Motors LLC to Establish Stay Procedures for Newly-Filed Ignition Switch Actions, with hearing to be held on July 2, 2014	6/13/2014	12724
<b>69</b>	Notice of Motion of General Motors LLC To Establish Stay Procedures for Newly-Filed Ignition Switch Actions	6/13/2014	12725
<b>70</b>	Supplemental Response by General Motors LLC in Connection with Stay Procedures Set Forth in the Court’s May 16, 2014 Scheduling Order	6/24/2014	12735
<b>71</b>	Notice of Presentment of Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of General Motors	7/1/2014	12747
<b>72</b>	Letter to the Honorable Robert E. Gerber from Lisa Rubin, on behalf of Wilmington Trust Company as trustee and administrator of GUC Trust, responding to New GM’s Notice of Presentment (ECF No. 12747)	7/1/2014	12753

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>73</b>	Notice of Presentment of Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of Wilmington Trust Company as trustee and administrator of GUC Trust	7/1/2014	12754
<b>74</b>	Letter to the Honorable Robert E. Gerber from Jonathan Flaxer, on behalf of Groman Plaintiffs, Regarding Proposed Counter-Order to Proposed Supplemental Scheduling Order	7/1/2014	12755
<b>75</b>	Notice of Presentment of Counter Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of Groman Plaintiffs	7/1/2014	12756
<b>76</b>	Order Granting Motion of General Motors LLC to Establish Stay Procedures for Newly-Filed Ignition Switch Actions	7/8/2014	12764
<b>77</b>	Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929	7/11/2014	12770
<b>78</b>	Fifth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	7/21/2014	12780
<b>79</b>	Fifth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	7/21/2014	12781
<b>80</b>	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of June 30, 2014	7/25/2014	12786
<b>81</b>	Decision with Respect to No Stay Pleading (Phaneuf Plaintiffs)	7/30/2014	12791
<b>82</b>	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	8/1/2014	12807

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>83</b>	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	8/1/2014	12808
<b>84</b>	Endorsed Order, Approving General Motors Letter filed on 8/1/2014 (ECF No. 12809) Regarding Proposed Page Limits for Briefs	8/4/2014	12810
<b>85</b>	Order Denying the Relief Requested by the Phaneuf Plaintiffs in Their No Stay Pleading	8/4/2014	12811
<b>86</b>	Endorsed Order, Adding Matters Raised in New GM August 1, 2014 Letter (ECF No. 12806) to Calendar for August 18 Conference	8/4/2014	12812
<b>87</b>	Notice of (A) Filing of (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions), and (II) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuit, and (B) Conference to be held in Connection with Such Motions on 8/18/2014, filed on behalf of General Motors LLC	8/4/2014	12813
<b>88</b>	Decision with Respect to No Stay Pleading and Related Motion to Dismiss for Lack of Subject Matter Jurisdiction (Elliot Plaintiffs)	8/6/2014	12815
<b>89</b>	Sixth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/7/2014	12818
<b>90</b>	Sixth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/7/2014	12819
<b>91</b>	Agreed and Disputed Stipulations of Fact Pursuant to the Court's Supplemental Scheduling Order, Dated July 11, 2014	8/8/2014	12826
<b>92</b>	Letter to the Honorable Robert E. Gerber from Arthur Steinberg on behalf of General Motors LLC, Pursuant to July 11, 2014 Supplemental Scheduling Order Regarding Agreed Upon & Disputed Stipulations of Fact	8/8/2014	12827

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>93</b>	Order Denying the Relief Requested in Plaintiffs Lawrence and Celestine Elliott's No Stay Pleading Pursuant to the Court's Scheduling Orders and Motion for Order of Dismissal for Lack of Subject Matter Jurisdiction Pursuant to Bankr. R. 7012(b) and for Related Relief	8/12/2014	12834
<b>94</b>	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2014	8/13/2014	12838
<b>95</b>	Seventh Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/14/2014	12843
<b>96</b>	Seventh Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/14/2014	12844
<b>97</b>	Letter to the Honorable Robert E. Gerber from Sander L. Esserman on behalf of Designated Counsel, Regarding Threshold Issues	8/15/2014	12854
<b>98</b>	Letter to the Honorable Robert E. Gerber from Daniel Golden on behalf of Akin Gump Strauss Hauer & Feld LLP, Regarding Threshold Issues Letters	8/15/2014	12856
<b>99</b>	"Limited" No Stay Pleading, filed on behalf of the People of the State of California	8/19/2014	12862
<b>100</b>	Endorsed Order, Approving Briefing Schedule Proposed in 8/21/2014 New GM Letter Regarding Four Threshold Issues (related document ECF No. 12867)	8/22/2014	12869
<b>101</b>	Response by General Motors LLC to the "Limited" No Stay Pleading Filed by the Orange County Plaintiff in Connection with the Court's July 8, 2014 Order Establishing Stay Procedures for Newly-Filed Cases, filed on behalf of General Motors LLC	8/29/2014	12876
<b>102</b>	Letter to the Honorable Robert E. Gerber from Arthur Steinberg on behalf of General Motors LLC, Regarding Revised Scheduling Orders and Stay Stipulations In Connection With Additional Motions to Enforce	9/10/2014	12890
<b>103</b>	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	9/15/2014	12897

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>104</b>	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	9/15/2014	12898
<b>105</b>	Transcript of August 18, 2014 Hearing Regarding Threshold Issues Letters, filed pursuant to the Supplemental Scheduling Order, Dated July 11, 2014	8/21/2014	12899
<b>106</b>	Eighth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	9/18/2014	12906
<b>107</b>	Eighth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	9/18/2014	12907
<b>108</b>	Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	9/18/2014	12908
<b>109</b>	Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	9/18/2014	12909
<b>110</b>	Errata Order Regarding Decision with Respect to No Stay Pleading (Phaneuf Plaintiffs) (ECF No. 12791)	10/2/2014	12934
<b>111</b>	Ninth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	10/6/2014	12938
<b>112</b>	Ninth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	10/6/2014	12939
<b>113</b>	Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	10/6/2014	12940

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>114</b>	Second Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	10/6/2014	12941
<b>115</b>	Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	10/6/2014	12942
<b>116</b>	Tenth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	10/15/2014	12950
<b>117</b>	Tenth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	10/15/2014	12951
<b>118</b>	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of September 30, 2014	10/24/2014	12963
<b>119</b>	Eleventh Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	11/5/2014	12976
<b>120</b>	Eleventh Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	11/5/2014	12978
<b>121</b>	Third Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	11/5/2014	12979
<b>122</b>	Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	11/5/2014	12980
<b>123</b>	Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	11/5/2014	12981



Item No.	Document	Filing Date	ECF No.
124	Appendix of Exhibits for Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	11/5/2014	12982
125	Consolidated Class Action Complaint Against New GM for Recalled Vehicles Manufactured By Old GM and Purchased Before July 11, 2009 or Later, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (JMF) (S.D.N.Y. Oct. 14, 2014) (ECF No. 347)	11/5/2014	12982-13
126	Consolidated Complaint Concerning All GM-Branded Vehicles that were Acquired July 11, 2009 or Later, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (JMF) (S.D.N.Y. Oct. 14, 2014) (ECF No. 345)	11/5/2014	12982-14
127	The Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue	11/5/2014	12983
128	Declaration of Deborah J. Newman in Support of the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue	11/5/2014	12984
129	Written Opinion signed on 11/10/2014 Regarding Decision with Respect to No Stay Pleading, and Related Motion for Abstention Regarding Sesay Plaintiffs	11/10/2014	12989
130	GUC Trust Quarterly GUC Trust Report as of September 30, 2014	11/12/2014	12997
131	Transcript of Hearing Held on 7/2/2014 9:46 AM Regarding "No Stay Pleadings" filed in Connection with Scheduling Order Regarding (I) Motion of General Motors, LLC Pursuant to 11 U.S.C. Sections 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929 (ECF No. 12697)	11/11/2014	13001
132	Transcript of Hearing Held on 8/5/2014 9:49 AM Regarding Plaintiffs Lawrence and Celestine Elliott's No Stay Pleading Pursuant to the Court's Scheduling Orders and Motion for Order of Dismissal for lack of subject matter jurisdiction pursuant to Bankr. R. 7012(B) and for related relief	11/21/2014	13003

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>133</b>	Twelfth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/1/2014	13009
<b>134</b>	Twelfth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/1/2014	13010
<b>135</b>	Fourth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	12/1/2014	13011
<b>136</b>	Fourth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	12/1/2014	13012
<b>137</b>	Thirteenth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/8/2014	13016
<b>138</b>	Thirteenth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/8/2014	13017
<b>139</b>	Responsive Brief of Designated Counsel for Pre-Closing Accident Plaintiffs on Threshold Issues Concerning New GM’s Motions to Enforce the Sale Order and Injunction	12/16/2014	13021
<b>140</b>	Response by General Motors LLC Regarding the Equitable Mootness Threshold Issue	12/16/2014	13024
<b>141</b>	Designated Counsel’s Opposition to New GM’s Motions for Enforcement of Sale Order and Injunction	12/16/2014	13025
<b>142</b>	Declaration of Edward S. Weisfelner in Support of Designated Counsel’s Opposition to New GM’s Motions for Enforcement of Sale Order and Injunction	12/16/2014	13026
<b>143</b>	Anton R. Valukas, Report to Board of Directors of General Motors Company Regarding Ignition Switch Recalls, dated May 29, 2014	12/16/2014	13026-2

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>144</b>	Consent Order, In re TQ14-001 NHTSA Recall No. 14V-047 (U.S. Dep't of Transp. May 16, 2014)	12/16/2014	13026-4
<b>145</b>	Declaration of Steve W. Berman in Support of Designated Counsel's Opposition to New GM's Motions for Enforcement of Sale Order and Injunction	12/16/2014	13027
<b>146</b>	The Groman Plaintiffs' Response to that Part of New GM's Opening Brief Regarding the "Fraud on the Court Legal Standard"	12/16/2014	13028
<b>147</b>	Designated Counsel's Response to the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue	12/16/2014	13029
<b>148</b>	Response of GUC Trust Administrator and Participating Unitholders to New GM's Opening Brief on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	12/16/2014	13030
<b>149</b>	Declaration of Lisa H. Rubin, Esq.	12/16/2014	13031
<b>150</b>	Corrected Exhibit 14 to the Declaration of Lisa Rubin, Esq.	12/17/2014	13032
<b>151</b>	Fourteenth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	12/24/2014	13038
<b>152</b>	Fourteenth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	12/24/2014	13039
<b>153</b>	Administrative Order Signed on 1/13/2015 Regarding Oral Argument on the Motion to Enforce and Related Matters	1/13/2015	13044
<b>154</b>	The Participating Unitholders' and GUC Trust Administrator's Reply Memorandum of Law Respecting the Equitable Mootness Threshold Issue	1/16/2015	13047
<b>155</b>	Reply Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	1/16/2015	13048
<b>156</b>	Appendix of Exhibits to Reply Brief By General Motors LLC on Threshold Issues Concerning Its Motions To Enforce the Sale Order and Injunction	1/16/2015	13049

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>157</b>	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of December 31, 2014	1/20/2015	13051
<b>158</b>	Endorsed Order Signed on 1/28/2015 Regarding Overall Time Requests and Proposed Sequence of Oral Argument	1/28/2015	13059
<b>159</b>	Second Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	1/28/2015	13060
<b>160</b>	Endorsed Order Signed on 1/30/2015 Regarding Letter to the Honorable Robert E. Gerber Pursuant to January 28, 2015 Endorsed Order Regarding Oral Argument and Related Matters (ECF No. 13064)	1/30/2015	13066
<b>161</b>	Letter to the Honorable Robert E. Gerber in accordance with the Court's Administrative Order, entered on January 13, 2015 [ECF No. 13044], First Endorsed Order, entered on January 28, 2015 [ECF No. 13059], and Second Endorsed Order, entered on January 30, 2015 [ECF No. 13066], filed on behalf of The People of the State of California	2/2/2015	13072
<b>162</b>	Response to Letter, dated February 2, 2015, Submitted by the State of California Regarding Oral Argument (ECF No. 13072)	2/3/2015	13073
<b>163</b>	Endorsed Order Signed on 2/9/2015 Regarding Letter Filed on behalf of The People of the State of California (ECF No. 13072)	2/9/2015	13078
<b>164</b>	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of December 31, 2014	2/12/2015	13082
<b>165</b>	Third Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	2/13/2015	13083
<b>166</b>	Transcript Regarding Hearing Held on 2/18/2015 9:00 AM Regarding Oral Argument on Motion to Enforce	2/20/2015	13096
<b>167</b>	Fourth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	3/23/2015	13097

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>168</b>	Fifth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	4/15/2015	13108
<b>169</b>	Decision on Motion to Enforce Sale Order	4/15/2015	13109
<b>170</b>	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of March 31, 2015	4/22/2015	13118
<b>171</b>	Sixth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	4/28/2015	13122
<b>172</b>	Fifth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	4/28/2015	13123
<b>173</b>	Fifth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	4/28/2015	13124
<b>174</b>	Joint Letter on Behalf of GUC Trust and the GUC Trust Unitholders (Regarding Proposed Form of Judgment)	5/12/2015	13135
<b>175</b>	Letter Regarding Proposed Judgment in Connection to Decision On Motion To Enforce Sale Order, filed by New GM	5/12/2015	13136
<b>176</b>	Joint Letter Enclosing Proposed Judgment of Co-Designated Counsel and Counsel for Economic Loss Plaintiffs and Designated Counsel and Counsel for Ignition Switch Pre-Closing Accident Plaintiffs in Response to April 15, 2015 Decision (ECF No. 13109) and Endorsed Order, dated May 5, 2015 (ECF No. 13131)	5/12/2015	13137
<b>177</b>	Amended and Restated Exhibits 2 and 3 to Letter Regarding Proposed Judgment In Connection To Decision On Motion To Enforce Sale Order, filed by New GM	5/12/2015	13139
<b>178</b>	Letter Regarding Proposed Judgment, filed on behalf of Groman Plaintiffs	5/12/2015	13141

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>179</b>	Status Report/Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of March 31, 2015	5/22/2015	13158
<b>180</b>	Decision RE: Form of Judgment	5/27/2015	13162
<b>181</b>	Order RE: Technical Matters Concerning Judgment	5/27/2015	13163
<b>182</b>	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Judgment, filed by Gary Peller on behalf of Elliot Plaintiffs	5/29/2015	13169
<b>183</b>	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by Arthur Steinberg on behalf of General Motors LLC	5/29/2015	13171
<b>184</b>	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by William Weintraub on behalf of Ignition Switch Plaintiffs in Pre-Closing Accident Lawsuits	5/29/2015	13172
<b>185</b>	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by Lisa Rubin on behalf of Wilmington Trust Company	5/29/2015	13173
<b>186</b>	Letter to the Honorable Robert E. Gerber Regarding Certification of Direct Appeal/Request for Procedural Stay, filed by Arthur Steinberg on behalf of General Motors LLC	5/29/2015	13174
<b>187</b>	Letter to the Honorable Robert E. Gerber Responding to Letter Filed by Gary Peller, dated May 29, 2015 (ECF No. 13169), filed by Arthur Steinberg on behalf of General Motors LLC	6/1/2015	13176
<b>188</b>	Judgment	6/1/2015	13177
<b>189</b>	Order Certifying Judgment for Direct Appeal to Second Circuit	6/1/2015	13178
<b>190</b>	Amended Notice of Appeal, filed on behalf of Elliot Plaintiffs	6/1/2015	13179
<b>191</b>	Amended Notice of Appeal, filed on behalf of Sesay Plaintiffs	6/1/2015	13180
<b>192</b>	Notice of Appeal, filed on behalf of Ignition Switch Plaintiffs	6/2/2015	13185
<b>193</b>	Notice of Appeal, filed on behalf of Pre-Closing Accident Plaintiffs	6/10/2015	13194
<b>194</b>	Notice of Cross-Appeal, filed on behalf of General Motors LLC	6/12/2015	13200

Item No.	Document	Filing Date	ECF No.
195	Notice of Cross-Appeal, filed on behalf of Wilmington Trust Company	6/15/2015	13204
196	Notice of Appeal, filed on behalf of Groman Plaintiffs	6/16/2015	13209
197	Transcript for Hearing Held on 5/2/2014 at 9:46 AM Regarding Status Conference, <u>Groman, et al. v. General Motors LLC (In re Motors Liquidation Corp.)</u> , Case No. 09-50026, Adv. Pro. No. 14-01929 (Bankr. S.D.N.Y. April 21, 2014) (ECF No. 16), attached hereto as <b><u>Exhibit 1</u></b>		
198	Transcript Regarding Hearing Held on 2/17/2015 9:00 AM Regarding Oral Argument on Motion to Enforce, attached hereto as <b><u>Exhibit 2</u></b>		
199	MDL Order No. 13 (Organization of Plaintiffs' Counsel, Protocols for Common Benefit Work and Expenses), <u>In re General Motors LLC Ignition Switch Litigation</u> , Case No. 14-md-2543 (JMF) (S.D.N.Y. Sept. 16, 2014) (ECF No. 304), attached hereto as <b><u>Exhibit 3</u></b>		
200	Notice of Errata and Correction to the Consolidated Class Action Complaint Against New GM for Recalled Vehicles Manufactured by Old GM and Purchased Before July 11, 2009, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (S.D.N.Y. Nov. 3, 2014) (ECF No. 379), attached hereto as <b><u>Exhibit 4</u></b>		
201	House of Representatives, Subcommittee on Oversight and Investigations, Committee on Energy and Commerce, <i>The GM Ignition Switch Recall: Why Did It Take So Long?</i> Transcript (Washington, D.C. April 1, 2014) (" <b><u>Apr. 1 Cong. Hr'g</u></b> "), attached hereto as <b><u>Exhibit 5</u></b>		
202	Apr. 1 Cong. Hr'g, Doc. 8 (GMHEC000001727-41), attached hereto as <b><u>Exhibit 6</u></b>		
203	Apr. 1 Cong. Hr'g, Doc. 9 (GMHEC000001742-54), attached hereto as <b><u>Exhibit 7</u></b>		
204	Apr. 1 Cong. Hr'g, Doc. 12 (December 2005 Service Bulletin No. 05-02-35-007), attached hereto as <b><u>Exhibit 8</u></b>		
205	General Motors Company, GM Redoubles Safety Efforts, Announces New Recalls (Form 8-K Exhibit 99.1) (March 17, 2014), attached hereto as <b><u>Exhibit 9</u></b>		

<b>Item No.</b>	<b>Document</b>	<b>Filing Date</b>	<b>ECF No.</b>
<b>206</b>	General Motors Company, GM Announces 5 Safety Recalls (Form 8-K Exhibit 99.1) (May 15, 2014), attached hereto as <b><u>Exhibit 10</u></b>		
<b>207</b>	General Motors Company, GM Will Rework or Replace Keys on 3.16 Million U.S. Cars (Form 8-K Exhibit 99.1) (June 16, 2014), attached hereto as <b><u>Exhibit 11</u></b>		
<b>208</b>	General Motors Company, GM Announces Six Safety Recalls (Form 8-K Exhibit 99.1) (June 30, 2014), attached hereto as <b><u>Exhibit 12</u></b>		
<b>209</b>	General Motors Company, Annual Report (for the fiscal year ended December 31, 2009) (Form 10-K) (April 7, 2010), attached hereto as <b><u>Exhibit 13</u></b>		
<b>210</b>	General Motors Company, Annual Report (for the fiscal year ended December 31, 2010) (Form 10-K) (March 1, 2011), attached hereto as <b><u>Exhibit 14</u></b>		
<b>211</b>	General Motors Company, 2010 Annual Report, dated March 1, 2011, attached hereto as <b><u>Exhibit 15</u></b>		
<b>212</b>	General Motors Company, 2011 Annual Report, dated February 27, 2012, attached hereto as <b><u>Exhibit 16</u></b>		
<b>213</b>	General Motors Company, 2012 Annual Report, dated February 15, 2013, attached hereto as <b><u>Exhibit 17</u></b>		
<b>214</b>	General Motors Company, 2013 Annual Report, dated February 6, 2014, attached hereto as <b><u>Exhibit 18</u></b>		
<b>215</b>	Motors Liquidation Company GUC Trust, Initial Distribution (Form 8-K) (dated April 21, 2011, filed April 27, 2011), attached hereto as <b><u>Exhibit 19</u></b>		
<b>216</b>	Motors Liquidation Company GUC Trust, Current Report (Form 8-K) (May 16, 2014), attached hereto as <b><u>Exhibit 20</u></b>		
<b>217</b>	Motors Liquidation Company GUC Trust, Annual Report (for the fiscal year ended March 31, 2014) (Form 10-K) (May 22, 2014), attached hereto as <b><u>Exhibit 21</u></b>		



Dated: July 8, 2015  
New York, New York

Respectfully submitted,

**BROWN RUDNICK LLP**

By: /s/ Edward S. Weisfelner  
Edward S. Weisfelner  
David J. Molton  
May Orenstein  
Howard S. Steel  
Seven Times Square  
New York, New York 10036  
T: 212-209-4800  
E: eweiselner@brownrudnick.com  
E: dmolton@brownrudnick.com  
E: morenstein@brownrudnick.com  
E: hsteel@brownrudnick.com

-and-

**STUTZMAN, BROMBERG, ESSERMAN  
& PLIFKA, P.C.**

Sander L. Esserman  
2323 Bryan Street, Suite 2200  
Dallas, Texas 75201  
T: 214-969-4900  
E: esserman@sbep-law.com

*Designated Counsel for Ignition Switch  
Plaintiffs*